

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DUSHANNE ASHLEY,

Plaintiff,

vs

DETECTIVE MIKE CIVIL, shield # 2114,

Defendant.

14-CV-05559

PLAINTIFF'S PROPOSED VOIR DIRE

Plaintiff respectfully proposes the following questions set forth below for inclusion in the Court's *voir dire* of the jury panel in the trial of the above-captioned case. Plaintiff is not proposing general background questions, like questions about employment or residence, and is instead only proposing questions Plaintiff believes are relevant to this specific case, or will be useful in learning more about a potential juror.

1. Have you, a family member, or a close friend ever served in law enforcement?
2. Who—besides friends or family—is a hero or someone you admire, and why?
3. What is something that you believe you are really good at, and how did you develop that skill?
4. What newspapers do read, what news programs do you watch, and what online news sources do you follow? I am not asking generally whether you read newspapers, or look on the internet, or follow Twitter, but instead would like specific examples of news sources.
5. Are you uncomfortable with cases where a plaintiff seeks money damages for alleged injuries?